

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: CLEO B. HALL , aka	:	Chapter 13
Cleo Bernadette Hall,	:	Case No. 5:23-bk-01315-MJC
Debtor(s),	:	
JACK N. ZAHAROPOULOS, Trustee ,	:	
Movant,	:	Motion to
v.	:	Dismiss
CLEO B. HALL ,	:	
Respondent,	:	

OBJECTION TO CERTIFICATION OF DEFAULT OF TRUSTEE

AND NOW COMES Debtor(s) **CLEO B. HALL**, by and through their attorneys, J. ZAC CHRISTMAN, ESQUIRE, with Objection to Certification of Default of Nationstar Mortgage, and in support thereof avers:

1. Debtor resolved a Trustee's Motion to Dismiss via Stipulation Approved on February 10, 2025.
2. In conjunction, Debtor prepared a Third Amended Chapter 13 Plan.
3. Subsequently, on March 10, 2025, Debtor filed a Motion to Modify Confirmed Plan.
4. The Motion to Modify Confirmed Plan was Granted on April 7, 2025.
5. On April 10, 2025, Debtor advised Counsel for Debtor that both Debtor and her fiancé were fully employed and reviewed the payments required to the mortgage lender and the Trustee.
6. On April 15, 2025, the Trustee filed a Certificate of Default with regard to a Stipulation that resolved a Motion to Dismiss.
7. On April 15, 2025, Counsel for Debtor conferred with Debtor and learned that payments to the Trustee were imminent, would cure a default on the Third Amended Plan by the end of April.

8. Debtor files this Objection to allow her time to demonstrate her ability to cure the Plan payments arrears to the Trustee and demonstrate that the continuance of this case is in the best interests of creditors.

WHEREFORE, Debtor(s) **CLEO B. HALL** respectfully pray(s) this Honorable Court for an Order that the Certification of Default of not result in entry of an Order Dismissing Case until such time as the Court could holds a hearing on the Certification of Default and the propriety of any such Order Dismissing Case, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,

/s/ J. Zac Christman
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